

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE ELETROBRAS SECURITIES
LITIGATION

Case No.: 15-cv-5754-JGK

JURY TRIAL DEMANDED

**LEAD PLAINTIFFS' UNOPPOSED MOTION
FOR PRELIMINARY APPROVAL OF SETTLEMENT**

Dominique Lavoie and the City of Providence, Rhode Island (together, “Lead Plaintiffs”), by and through undersigned Lead Counsel, respectfully move this Court for an order (1) granting preliminary approval of the proposed settlement (the “Settlement”); (2) certifying the proposed Settlement Class for purposes of the Settlement pursuant to Fed. R. Civ. P. 23(a) and 23(b)(3); (3) approving the forms for mailed and published notice of the Settlement; (4) authorizing the mailing and publication of these notices; and (5) setting a date and time for the fairness hearing with respect to the proposed Settlement and Plan of Allocation. Lead Plaintiffs file the accompanying Memorandum in support thereof. A proposed order is attached as Exhibit A to the Stipulation of Settlement submitted herewith.

Dated: June 29, 2018

Respectfully Submitted,

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Co-Lead Counsel for the Class

CERTIFICATE OF SERVICE

I, Ramzi Abadou, hereby certify that, on Friday, June 29, 2018, I caused the foregoing to be served on all counsel of record by filing the same with the Court using the CM/ECF system which will send electronic notices of the filing to all counsel of record.

s/ Ramzi Abadou

Ramzi Abadou